



SEMS-RM DOCID # 1166780

California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

September 20, 2010

Mr. Jon Armstrong
ARCO/BP West Coast Products LLC
501 Westlake Park Blvd., WL1-28.160D
Houston, TX 77079

UNDERGROUND STORAGE TANK PROGRAM – DIRECTIVE TO TAKE CORRECTIVE ACTION IN RESPONSE TO UNAUTHORIZED UNDERGROUND STORAGE TANK RELEASE – HEALTH AND SAFETY CODE SECTION 25296.10 AND TITLE 23, CHAPTER 16, CALIFORNIA CODE OF REGULATIONS, SECTIONS 2720-2727

ARCO #1289

4861 EAST FIRESTONE BOULEVARD, SOUTH GATE (CASE NO. I-12054) (Priority A1)

Dear Mr. Armstrong:

Pursuant to Health and Safety Code section 25296.10, you are required to take corrective action (i.e., Preliminary Site Assessment, Soil and Water Investigation, Corrective Action Plan Implementation, and Verification Monitoring) to ensure protection of human health, safety and the environment. Corrective action requirements are set forth in California Code of Regulations (CCR), title 23, sections 2720 through 2727.

Confirmation Soil Boring Investigation and Soil Vapor Survey (Per CCR Title 23, §2727)

We have reviewed your "Soil Sampling and Soil Vapor Investigation Work Plan" dated August 11, 2010, and "Technical Review of Mass Removal Calculations" dated August 15, 2010, prepared by your consultant ARCADIS US, Inc. Your workplan contains a proposal to advance three soil borings to approximately 43 feet below ground surface to investigate the contamination previously encountered in the area of the former dispenser islands and former USTs. Soil samples in each boring will be collected from the interval with the highest PID reading. If PID readings are low or similar, a soil sample representative of the lithology will be collected. Your workplan also include a proposal to install three temporary soil vapor probes to approximately 10 feet bgs and approximately 5 feet away from the confirmation soil borings. The soil vapor samples will be collected using Summa canisters for laboratory analysis. Your Mass Removal Calculations report clarifies that the mass removal calculation was based on the laboratory analytical results of the influence concentration instead of the PID readings of the influence concentration. Based on our review, we concur with your workplan for the soil and soil gas investigation as proposed, provided the followings conditions are met:

1. All permits must be obtained from the appropriate agencies prior to the start of work.
2. Soil and groundwater samples must be analyzed by Cal-LUFT GC/FID or Cal-LUFT GC/MS Method for total petroleum hydrocarbons as gasoline (TPH_G), total petroleum hydrocarbons as diesel (TPH_D); and by EPA Method 8260B for BTEX, and fuel oxygenate compounds including methyl tertiary butyl ether (MTBE), di-isopropyl ether (DIPE), ethyl

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tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA). Ethanol is also required and shall be analyzed by either method above. The analytical detection limits must conform to the Regional Board General Laboratory Testing Requirements (9/06) (http://www.waterboards.ca.gov/losangeles/html/lab_report.html). All respective analytical methods must be certified by the California Environmental Laboratory Accreditation Program (ELAP). All analytical data must be reported by a California-certified laboratory.

3. The soil gas sampling must be conducted in accordance with the Regional Board-DTSC Advisory – Active Soil Gas Investigations (January 28, 2003), available at http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation.
4. Pursuant to State Water Resources Control Board Resolution No. 92-49, under Water Code Section 13304, all fieldwork related to subsurface investigation must be conducted by, or under the direct responsible supervision of, a licensed California Professional Geologist (PG) or Civil Engineer (PE). All technical documents submitted to this Regional Board must be reviewed and signed and/or stamped by a licensed California PG or PE with at least five years subsurface hydrogeologic experience. A California-licensed land surveyor must survey all monitoring wells. The survey report, signed by the licensee, shall be included in the assessment report.
5. You are required to notify us at least seven working days prior to field work so that we can schedule a member of our staff to be present.
6. All reports submitted to this office must conform to the "Guidelines for Report Submittals - Revised June 1993" published by the Los Angeles County Department of Public Works.
7. In addition to the three proposed soil vapor samples at 10 feet bgs, you are required to obtain three additional soil vapor samples at 5 feet bgs for laboratory analysis. This is needed since previous soil samples collected in the vicinity of the proposed soil vapor samples showed high concentrations at a depth of 3 feet bgs (i.e. Soil sample P-2 showed TPHg at 5,900 mg/kg at 3 feet bgs).

You are required to report this phase of work to our office by **January 15, 2011**, along with the remediation progress report and semi-annual groundwater monitoring report.

If you have any questions regarding this matter, please contact Mr. Nhan Bao at (213) 576-6703 or nbao@waterboards.ca.gov.

Sincerely,



Gregg Kwey, P.E.
Senior Water Resource Control Engineer

See page 3 for cc:

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Mr. Jon Armstrong
ARCO/BP West Coast Products LLC

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September 20, 2010

cc: Ms. Kathy Jundt, State Water Resources Control Board, UST Cleanup Fund
Mr. Tim Smith, Los Angeles County Department of Public Works
Ms. Gladis Deras, City of South Gate, 8650 California Ave., South Gate, CA 90280
Ms. Norma Jauregui, **Personal Matters / Ex. 6**
Mr. Jeremie Maehr, ARCADIS

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